



Re: Discovery responses for Felberbaum

From Camilla Redmond <credmond@gkmrlaw.com>

Date Mon 6/16/2025 11:33 AM

To MENACHEM White <mwhite@wwlgny.com>; Richard Min <rmin@gkmrlaw.com>; Michael Banuchis <MBanuchis@gkmrlaw.com>

Counsel,

You have not responded to our email and addressed our concerns. We plan to raise these issues with the Court today.

Best,
Camilla

Camilla Redmond Costa | Green Kaminer Min & Rockmore LLP

420 Lexington Ave. Ste. 2821 | New York, NY 10170

O: 212.681.6400 | F: 212.681.6999

credmond@gkmrlaw.com | www.gkmrlaw.com

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From: Camilla Redmond <credmond@gkmrlaw.com>

Sent: Thursday, June 12, 2025 10:42 AM

To: MENACHEM White <mwhite@wwlgny.com>; Richard Min <rmin@gkmrlaw.com>; Michael Banuchis <MBanuchis@gkmrlaw.com>

Subject: Re: Discovery responses for Felberbaum

Dear Counsel,

I confirm receipt of your email.

In your discovery response, you stated, "All documents in [y]our possession have been provided." However, we have not received any documentation from you. Please advise.

Additionally, regarding your statement, "Same will be provided upon receipt," could you specify the expected timeframe for production? Your deadline for submission is today.

In your response to Interrogatory 1, you state: "Myself and any others determined appropriate to testify will be provided as soon as possible with all necessary details." Following up on my email to you from yesterday, Petitioner's Initial Disclosures were due on June 6, 2025. We note that you are six days past your deadline, which was already extended by the Court. Please advise on your intention regarding serving the Petitioner's initial disclosures.

Also, you note in your response to RFP 9: "A. Same will be provided upon receipt if any if and when a decision is made regarding any expert witness to be called." Petitioner's deadline to serve Expert Disclosures was on June 3, 2025. We did not consent to an extension to this deadline, nor did the Court offer you more time to serve your expert disclosures.

Lastly, I note that your interrogatory responses have not been verified by your client, which is required under Rule 33 of the Federal Rules of Civil Procedure. Please provide a signed verification to accompany the responses.

We reserve all rights regarding your failure to comply with the Court's deadlines.

Best,
Camilla

Camilla Redmond Costa | Green Kaminer Min & Rockmore LLP
420 Lexington Ave. Ste. 2821 | New York, NY 10170
O: 212.681.6400 | F: 212.681.6999
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From: MENACHEM White <mwhite@wwlgny.com>

Sent: Thursday, June 12, 2025 10:11 AM

To: Camilla Redmond <credmond@gkmrlaw.com>; Richard Min <rmin@gkmrlaw.com>; Michael Banuchis <MBanuchis@gkmrlaw.com>

Subject: Discovery responses for Felberbaum

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Dear counsel,

Please see attached paperwork.

Very truly yours,

M. White, Esq.

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The White Law Group
Nassau County Office
4 Brower Avenue, Suite 3
Woodmere, New York 11598
(516) 504-4101

Brooklyn Office
26 Court Street Suite 405
Brooklyn, New York 11242
P: (718) 858-4500
F: (718) 596-2610

Email: Mwhite@wwlgny.com
Website: FAMILYATTORNEYNY.COM

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